

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Defendants, Finesse Construction LLC and Innovative Disposal Systems LLC (collectively "Defendants) by and through their counsel, Leonard Herman, hereby answer the Cross-Claim asserted by Juda Construction LTD., Pure Earth Inc., Pure Earth Transportation and Disposal Systems, Inc. a/k/a American Transportation and Disposal Systems, LTD and Pure Earth Materials, Inc. a/k/a South Jersey Development Inc.

(hereafter the Pure Earth Defendants) as follows::

- 1) Deny the allegations set forth in the Cross Claim of the Pure Earth defendants in their Answer to the Second Amended Complaint filed September 19, 2007 at pages 37-38.

WHEREFORE, Finesse Construction LLC and Innovative Disposal Solutions LLC demand judgment be granted as follows:

- A. Dismissing the Cross Claims of the Pure Earth defendants with prejudice and without costs or attorney fees.
- B. Granting the defendants attorney fees, costs and disbursements to the extent provided by contract, statute or otherwise; and
- C. Together with such other, further or different relief as the Court deems just and proper.

Dated: Ardsley, NY
September 24, 2007



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